

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

THE UNITED STATES OF AMERICA

vs.

Case No. 3:98CR0009-014 (CCC)

IRVING TORRES-GONZALEZ

* * * * *

**MOTION IN RESPONSE TO RELEASEE'S REQUEST
FOR EARLY TERMINATION**

**TO THE HONORABLE CARMEN CONSUELO CEREZO
U.S. DISTRICT JUDGE
DISTRICT OF PUERTO RICO**

COMES NOW, DAMARYS I. TELLADO, U.S. PROBATION OFFICER of this Honorable Court, and respectfully submits as follows:

1. That a supervision status report and early termination stance is hereby presented.
2. That Mr. Torres-González was sentenced on July 13, 1999, to serve 46 months in prison and three (3) years of supervised release after having pled guilty to violating Title 21, U.S. Code, Sections 841 (a) (1). The releasee was ordered to pay a special monetary assessment in the amount of \$100, provide urine specimens to determine drug abstinence as well as comply with all other standard and special conditions imposed.
3. That the offender has satisfied all of the special conditions imposed by the Court and has complied with all other conditions of release.
4. That he has not been involved in or suspected of any illegal or dubious behavior as confirmed by the community contacts that have been established throughout his term of supervision and record police checks submitted.

5. That he has maintained himself gainfully employed throughout the term of supervision and has continued to enhance his educational studies by enrolling in the University.

6. That Mr. Torres-González' disposition towards his family and the community in general has been one of responsibility and dedication.

7. That the releasee's desire to be granted early termination rests on his intention of requesting the state court for the custody of his two daughters.

8. That the government, represented by Assistant U.S. Attorney Sonia Torres, was asked to voice her opinion regarding the petition at hand and a final response is being awaited.

WHEREFORE, I declare under penalty of perjury, that the foregoing is true and correct. Unless the Court rules otherwise, it is this officer's recommendation that Mr. Torres-González' petition for early termination be granted given his positive adjustment to supervision. We additionally request that if the Court is inclined to grant the releasee's petition, the same be awarded after May 27, 2005, when he is scheduled to submit to DNA collection.

In San Juan, Puerto Rico, this 26th day of May 2005.

s/Damarys I. Tellado
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on May 26, 2005, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following: Assistant U.S. Attorney, Sonia Torres and to defense attorney, Teodoro Méndez-Lebrón.

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